



Community Action Agency

Contractor Implementation Manual

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Helpful Links

All Programs

OKGrants Grant Management System

<https://grants.ok.gov>

ODOC OKGrants Resource Page (walkthroughs, FAQ and troubleshooting)

<http://okcommerce.gov/community/okgrants/>

IRS 501(c)(3)

<https://www.irs.gov/charities-non-profits/charitable-organizations/exemption-requirements-section-501c3-organizations>

2 CFR 200

http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

Robert's Rules of Order

<http://www.robertsrules.org/>

74 O.S. Standard 257:1-1-2

<http://www.oscn.net/applications/oscn/deliverdocument.asp?id=457202&hits=8548+8547+5703+2492+2491+>

OK Open Meeting Act - 25 O.S. §301-314

<http://www.odl.state.ok.us/lawinfo/docs/2006-LibraryLaws PartD.pdf>

OK State Travel Reimbursement Act - 74 O.S. §500.1

[State of Oklahoma Travel Policy](#)

United States General Services Administration:

http://www.gsa.gov/portal/content/104877?utm_source=OGP&utm_medium=print-radio&utm_term=perdiem&utm_campaign=shortcuts

Freedom of Information Act 5 USC 552

<https://www.justice.gov/oip/blog/foia-update-freedom-information-act-5-usc-sect-552-amended-public-law-no-104-231-110-stat>

CSBG Program Links

Economic Opportunity Act of 1964, Pub. L. 88-452

<http://www.gpo.gov/fdsys/pkg/STATUTE-78/pdf/STATUTE-78-Pg508.pdf>

Community Services Block Grant Act

[Community Services Block Grant \(CSBG\) | The Administration for Children and Families \(hhs.gov\)](#)

CSBG IM No. 116 Correction Action, Termination, or Reduction of Funding

[CSBG IM #116 Corrective Action, Termination, or Reduction of Funding | The Administration for Children and Families \(hhs.gov\)](#)

Coats Human Services Reauthorization Act of 1998

<http://www.gpo.gov/fdsys/pkg/PLAW-105publ285/html/PLAW-105publ285.htm>

Section 1 – Requirements for All Programs

Req. 101 – ROMA

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 101 RESULTS ORIENTED MANAGEMENT AND ACCOUNTABILITY (ROMA)

EFFECTIVE DATE:	JANUARY 2017
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

- A. ROMA is a complete management and accountability framework that is focused on results and continuous quality improvement. ROMA enables the network to measure, analyze and communicate performance and shift to a culture of learning rather than a compliance and reporting culture. There are five parts to the ROMA cycle:
1. Assessment
 2. Planning
 3. Implementation
 4. Achievement of Results, and
 5. Evaluation
- B. All subgrantee recipients must adopt and use the ROMA framework for all programs, both ODOC and non ODOC funded.
- C. All subgrantee recipients must adopt and use ROMA Next Generation practices and principles that support the use of performance data to achieve major goals/outcomes for individuals, families and communities
- D. Subgrantees are encouraged to develop a local Theory of Change (TOC) to guide the organization's activities
- E. Subgrantee recipients are required to track and report program outcomes for all ODOC funded and all CSBG supported programs.

II. TERMS & DEFINITIONS

ROMA Results Oriented Management and Accountability, (ROMA) is a management approach that builds accountable results into the Agency's daily operations. ROMA provides a process and tools that allow us to measure and evaluate the effectiveness of our programs and make improvements in our capacity and performance. ROMA also provides the national network of Community Action Agencies with a framework of goals to implement the Government Performance Results Act of 1993.

ROMA Next What has been called "ROMA Next Generation" is a way of talking

Generation	about an increased focus on the elements of ROMA in the context of the OCS Performance Management Framework. It is also about using some new tools to assure the network is implementing the full ROMA cycle to achieve results for individuals, families and communities.
CSBG Performance Management Framework	<p>The elements of the CSBG Performance Management Framework include the following:</p> <ul style="list-style-type: none"> • Organizational Standards • State & Federal Accountability Measures • ROMA • CSBG State Plan • CSBG Annual Report • American Customer Satisfaction Index (ACSI) Survey
Theory of Change (ToC)	A conceptual roadmap for how an organization expects to achieve its intended impact and what difference the agency intends to make within its communities. This graphic representation outlines what the organization expects to change and what services/strategies will achieve that change.
Community Needs Assessment (CNA)	A comprehensive profile of the community that includes both needs (of the community in general and people with low-income specifically) and its available resources. Quantitative and qualitative data is collected and analyzed to determine the causes and conditions of poverty within the service area and develop a prioritized list of community needs.
Community Action Plan (CAP)	A results-oriented annual plan describing how the Community Action Agency intends to address the causes and conditions of poverty within its service area. The plan strategically determines what impact the agency plans to have during the calendar year, what services and initiatives will be implemented and how its resources will be allocated. The annual CAP aligns with long-term goals in the strategic plan with a focus on meeting the organizational mission and achieving the local theory of change
Strategic Plan	A results-oriented 3-5 years plan that describes how the Community Action Agency intends to address the causes and conditions of poverty within its service area over time. The strategic plan outlines the organization's vision for the future, helps to establish community initiatives, prioritize goals, make resourcing decisions, and rally employees, council members, stakeholders, and citizens around a shared vision. The plan strategically determines what impact the agency plans to have with a focus on meeting the organizational mission and achieving the local theory of change

III. PROCEDURES

A. ROMA TRAINING

Every subgrantee recipient is required to have all staff and board members trained in ROMA, unless special permission has been granted by ODOC. The training required depends upon the staff or board position. If a subgrantee recipient has any ROMA training needs or questions about ROMA training, they should send an email to their ODOC liaison.

1. INTRO TO ROMA TRAINING (8-hour presentation)

All leadership and management positions who are involved in strategic planning must receive this training. All other key personnel responsible for ROMA implementation within the subgrantee recipient will also be required to receive this training. This training can ONLY be provided by a Nationally Certified ROMA Trainer (NCRT) or those working towards certification, under the supervision of an NCRT. Training may not be offered in one (1) consecutive eight-hour setting; training may be split into multiple sessions and may be facilitated virtually or in-person depending on scheduling and availability of Trainers.

2. CAA IN A NUTSHELL (10-15 minutes, self-paced)

All remaining staff, not receiving Intro to ROMA training, will be required to receive this training. This training can be self-administered and does not require an NCRT to be present. This training is available in two formats – electronic or paper. See attachments 2 a-b.

3. ROMA BOARD TRAINING (self-paced)

All board members are required to receive ROMA training. Training can be done as a full board or individually. Training can be self-administered and does not require an NCRT to be present. Board members must sign a statement, to be kept in their board file, stating they have received board training and the source and name of the training session. The following are acceptable sources for board training:

- https://m.youtube.com/watch?v=-_EciSliq7U
- https://communityactionpartnership.com/publication_toolkit/roma-next-generation-resource-guide/

B. ROMA IMPLEMENTATION

Every subgrantee recipient is required to submit a ROMA Implementation Plan [Form 17] with their annual CSBG application, as part of the Community Action Plan. The ROMA Implementation Plan assists the subgrantee recipient in documenting their implementation of the full ROMA cycle. If dates or changes are made to the plan through the calendar year, the revised plan should be submitted to ODOC.

The ROMA implementation framework that subgrantee recipients, at a minimum, must follow is outlined below:

Assessment: assess community needs and its resources

- a. Must have a clear anti-poverty mission statement that is periodically reviewed by the board
- b. Must conduct a Community Needs Assessment (CNA) at least every three years to assess resources, and the causes and conditions of poverty, within the service community, following the Oklahoma Community Needs Assessment Guide for

Community Action Agencies

- c. Must use the CNA data to identify needs to be addressed in the community at the family, agency, and community levels
 - d. Determine what identified needs can reasonably be addressed either independently or in partnership with other organizations
2. Planning: use agency mission, ToC and CNA to support services and initiatives
 - a. Must develop a Community Action Plan that is outcome based, anti-poverty focused and ties directly to the CNA
 - b. Must use the information gathered during the assessment process to inform a strategic plan
 - c. Must use the needs identified in the CNA to develop measurable local outcomes and outcome indicators, and those that directly correspond with the three ROMA National Goals:
 - (1) Individuals and families with low incomes are stable and achieve economic security.
 - (2) Communities where people with low incomes live are healthy and offer economic opportunity.
 - (3) People with low incomes are engaged and active in building opportunities in communities.
 - d. Strategically respond as an agency to individual, family, and community needs and determine what impact the agency plans to have and what are the performance targets, then determine what services and initiatives will be implemented.
 - e. Must plan programs, activities, and services based on the needs identified in the CNA, at the same level as the need, in order to achieve the planned outcomes
 - f. Must set projected success rates for all outcomes
 - g. Must determine what documentation will be collected to measure each outcome, how often data will be collected, and by whom.
 - h. Must submit three planning logic models, with projected success rates, (for top three needs addressed) along with the annual CSBG application.
 - i. Use the Core Principles in the Theory of Change to help guide the development and updates for the agency strategic plan and community action plan
3. Implementation: implement service and initiatives/strategies to produce results
 - a. Must implement programs/services as planned in the Community Action Plan and Strategic Plan.
 - b. Plan must include Needs/Outcomes that are observed, measured and documented as Agency, Community or Family levels.
 - b. Subgrantees must have a process for observing progress, analyzing/evaluating outcomes, and using data to make changes as needed.
4. Achievement of Results: observe, analyze/evaluate, and report outcomes and progress
 - a. Subgrantees must use the CAPTAIN data system to track and report client outcomes and outputs (at family, agency, and community levels) for all ODOC and non ODOC funded programs in an ongoing manner.
 - b. For subgrantees using CAPTAIN, data should be entered by the 20th of each month for all programs.

- c. For subgrantee recipients submitting paper reports, data should be submitted to ODOC as approved (prior ODOC approval is required for paper reporting).
 - d. All subgrantee recipients must have their data regularly reviewed by board and executive management (best practice: quarterly review; minimum: annual review).
 - e. Must submit the CSBG Information Survey (Annual Report) each year in a timely, complete, and accurate manner.
 - f. Must compare results actually achieved with projected success rates
 - g. Must submit at least three final logic models (for top three needs addressed) with actual results with the next year's CSBG application.
5. Evaluation: analyze data and compare with benchmarks:
- a. The ROMA process must be integrated throughout the subgrantee's organization
 - b. Data collected must be shared with the subgrantee's board of directors on a regular basis for evaluation (best practice: quarterly review; minimum: annual review).
 - c. Results collected throughout the year should be used to determine the programs, activities, and services to be provided and annually update the Community Action Plan and Strategic Plan and for continuous program quality improvements.
 - d. Results must be collected following the Oklahoma Community Needs Assessment Guide for Community Action Agencies using the CAP Systems software
 - e. Outcome Results must be used to determine the following:
 - i. what changed for the people served and what changed in the community
 - ii. what outcomes were achieved and for whom
 - iii. did the outcomes meet the needs identified in the assessment process
 - iv. how well the outcomes tracked success and if the targets were met
 - v. what services and initiatives contributed to achieving outcomes
 - vi. what can be improved to better respond to local needs.

A. ROMA REQUIREMENTS

1. Every subgrantee is required to adopt and use the ROMA NEXT GENERATION principles that support the use of performance data to achieve major goals/outcomes for individuals, families and communities and strengthen the performance management culture of the CSBG Network:
 - a. Focus on integrating information on the people served, services and strategies provided, and outcomes achieved by eligible entities.
 - b. Incorporate organizational standards and state and federal accountability measures to help achieve the full potential of CSBG
 - c. Represent a system for continuous quality improvement of CSBG services, strategies, initiatives and outcomes through the use of data at all levels
 - d. Create learning organizations at all levels of the CSBG network
2. Every subgrantee is required to utilize the Data collected and analyzed (from assessment through evaluation) to identify successes and challenges and make use of the information for continuous quality improvement and as a guide to determining future program services.
3. Subgrantees are required to execute each step of the ROMA cycle and ensure the full integration of ROMA, at all levels of the organization, with focus on continuous quality improvement utilizing the Community Needs Assessment, the Community

Action Plan (agency annual plan), the Strategic Plan agency (long-term plan), the State Plan and the Annual Report.

a. Results-Oriented Management

- i. Assess poverty needs and conditions within the community
- ii. Define a clear agency anti-poverty mission for community action and a strategy to address those needs, both immediate and longer term, in the context of existing resources and opportunities in the community
- iii. Mobilize and coordinate the resources and partnerships that can carry out those strategies
- iv. Identify specific improvements, or results, to be achieved among low-income people and the community; and
- v. Organize and implement programs, services, and activities, such as advocacy, within the agency and among “partnering” organizations, to achieve anticipated results.

b. Results-Oriented Accountability

- i. Develop and implement strategies to measure and record improvements in the condition of low-income people and the communities in which they live that result from community action intervention
- ii. Use information about outcomes, or results, among agency tripartite boards and staff to determine the overall effectiveness, inform annual and long-range planning, support agency advocacy, funding, and community partnership activities.

4. Subgrantees are strongly encouraged to develop a local Theory of Change (ToC) and utilize the ToC to guide the planning, participation, and evaluation of the organization’s activities. **Theory of Change** defines long-term goals and then maps backward to identify necessary preconditions and provides a graphic overview of the core principles, performance management framework, and services and strategies implemented to achieve the goals of Community Action. A local ToC is valuable to Community Action Agencies because:
 - a. provides a roadmap for change
 - b. a theory of change helps define and prioritize strategies needed to achieve results
 - c. can be used for evaluation, strategic planning and fund raising

III. FORMS

1. ROMA Implementation Plan: to be submitted as part of the annual CAP (available in both Word and Excel) [**Form 17**]

IV. ATTACHMENTS

None

Req. 102 – Guidelines for Personnel Policies

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 102

GUIDELINES FOR PERSONNEL POLICIES EFFECTIVE

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall establish and adhere to clear and equitable personnel policies.

II. PROCEDURES

A. GENERAL ADMINISTRATION: Personnel policies shall include:

1. Statement on travel and travel allowances for employees that conforms to Oklahoma Department of Commerce, Office of Community Development (ODOC) Requirement 106.
2. Records to be included in personnel files:
 - a. Employee time sheets documenting hours worked and identifying the amount of time spent on each program.
 - b. Leave records that fully account for all absences. If tracked or maintained electronically, records shall be provided upon request.
 - c. Individual personnel files that include but are not limited to: Job description, pay adjustment authorizations, and application for employment.
 - d. Annual employee evaluations.
3. Statement regarding accessibility to personnel files.
4. Provision for certification of time and attendance reports.
5. If leave records and time sheets are maintained electronically, agency personnel policies shall include the procedures to be utilized for employees to enter their time and leave and for the supervisory approval process.

B. EMPLOYMENT: Personnel policies shall include statements that:

1. Describe employee categories such as full-time, probationary, etc.
2. Describe employee performance appraisal.
3. Prohibit discrimination on the basis of race, color, national origin, age, sex, religion, familial status or disability.
4. Prohibit conflicts of interest and nepotism.
 - a. Nepotism shall refer to the employment or supervision of any person who is a relative within the third degree of a Board Member, Executive Director, or appointing authority. Relatives may not be employed, supervised, or contracted with when they are to be paid with ODOC funds or when the Board Member, Executive Director, or appointing authority exercises jurisdiction or control over said department or program.
 - b. Relatives signing contracts with the agency prior to the election or selection of the Board Member, Executive Director, or appointing authority may complete the contracted obligation prior to termination. However, such contracts shall not be renewed.

- c. For purposes of this requirement “relative within the third degree” is defined as follows:

Spouse	
Parents	Spouse’s Parents
Children	Spouse’s Children
Brother/Sister	Spouse’s Brother/Sister
Grandparents	Spouse’s Grandparents
Grandchildren	Spouse’s Grandchildren
Aunt/Uncle	Spouse’s Aunt/Uncle
Nephew/Niece	Spouse’s Nephew/Niece
Great-Grandparents	Spouse’s Great-Grandparents
Great-Grandchildren	Spouse’s Great-Grandchildren

- (1) Spouse of someone related to Board Member by marriage is eligible for employment.
 - (2) Spouse of someone related to Board Member by blood is ineligible for employment.
 - (3) “Children” includes adopted children and stepchildren.
5. Permit employment of persons with criminal records when the Subgrantee Recipient determines the criminal record does not disqualify the applicant for the position under consideration.
6. Salaries and benefits are consistent with prevailing local wage compensation practices, provided no employee shall receive less than minimum wage. Add CSBG wage study wording. Note: CSBG does not require a survey to be completed regularly – best practices suggest every five years. Some agencies set their own timeline.

C. FRINGE BENEFITS: Personnel policies shall include statements which:

1. Describe provisions for annual leave, sick leave, family leave, military leave, leave without pay, and jury duty.
2. List holidays to be observed by the Subgrantee Recipient.
3. List other benefits.

D. EMPLOYEE CONDUCT: Personnel policies shall include statements which:

1. Prohibit the receipt of gifts, services, or other compensation by employees from persons receiving benefits or services from the Subgrantee Recipient.
2. Describe limitations on political activity.

E. GRIEVANCE PROCEDURE: Personnel policies shall include a written description of procedures for the prompt review, impartial consideration and equitable disposition of employee grievances. These procedures shall also include a policy that shall be used in the case of a grievance against the Executive Director.

III. FORMS

None.

Req. 103 – Affirmative Action

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 103

AFFIRMATIVE ACTION REQUIREMENTS EFFECTIVE

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

No person shall, on the grounds of race, color, national origin, religion, sex, age, familial status or disability, be excluded from participation in, be denied benefits of or be subjected to discrimination under any program, project or activity funded in whole or in part with funds made available by ODOC.

II. PROCEDURES

Each Subgrantee Recipient shall submit annually to ODOC an Affirmative Action Plan that has been approved by its Board of Directors. The Affirmative Action Plan shall include the following:

- A. Equal employment policy.
- B. Responsibilities for Implementation.
- C. C. Evaluation of previous efforts.
- D. Established goals and timetables.
- E. Identification of problem areas.
- F. Procedures for dissemination of the Plan.
- G. Internal evaluation procedures.
- H. Grievance procedures.
- I. Identification of the Equal Employment Opportunity (EEO) Officer. (Neither the Executive Director nor the Personnel Officer may serve as the EEO Officer.)

III. FORMS

None.

Req. 104 – Applicant Appeals

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 104

APPLICANT APPEALS

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall establish and maintain an applicant appeals procedure to ensure equal access to services and resources available under programs funded by ODOC.

II. PROCEDURES

- A. The notice of right to appeal shall appear on all application forms used to determine applicant eligibility for any services or resources provided with funds received from ODOC.
- B. The Subgrantee Recipient's Executive Director shall initiate the appeals procedure, upon request by an applicant, within ten (10) days after the request.
- C. After all local appeal procedures have been exhausted, an applicant may appeal the Subgrantee Recipient's decision to ODOC. In such cases, the Subgrantee Recipient and appellant shall provide ODOC with all relevant documentation.
- D. The applicant appeals procedure shall guarantee that each person seeking services shall:
 - 1. Have the right to file formal application for services or resources upon request.
 - 2. Be afforded an opportunity to have private and confidential interviews pertaining to the case.
 - 3. Not be denied assistance on the basis of race, color, gender, creed, religion, age, political preference, familial status or disability.
 - 4. Receive timely approval or disapproval of the application.
 - 5. Receive written notification of appeal and appeal procedures, including notices that:
 - a. All aggrieved parties shall be afforded a reasonable opportunity for a fair hearing.
 - b. The applicant or the representative of the applicant shall have access to records relevant to the appeal process.
 - c. The applicant shall have the right to a timely determination and prompt notice of hearing decisions.

III. FORMS

None

Req. 105 – Prohibited Political Activities

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 105

PROHIBITED POLITICAL ACTIVITIES

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipient employees, volunteers and Board Members, while performing Subgrantee Recipient activities and functions, shall adhere to restrictions against certain types of political activity, as specified in the Community Services Block Grant (CSBG) Act

<http://codes.lp.findlaw.com/uscode/42/106>, State legislation and other related requirements.

II. PROCEDURES

A. Subgrantee Recipient may not:

1. Use official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office.
2. Directly or indirectly coerce, attempt to coerce, command or advise a State or local officer or employee to pay, lend or contribute anything of value to a party, committee, organization, agency or person for political purposes.

B. Subgrantee Recipients may not provide voters and prospective voters with transportation to the polls or provide similar assistance in connection with an election or any voter registration activity. This also prohibits the use of agency transit vehicles for these purposes.

C. Under 74 O.S. Standard 257:1-1-2:

<http://www.oscn.net/applications/oscn/deliverdocument.asp?id=457202&hits=8548+8547+5703+2492+2491> Subgrantee Recipients may not:

1. Use program funds for any political purpose.
2. Permit the use of equipment or premises that are purchased or leased with program funds for a political purpose.
3. Discriminate against or in favor of any employee or beneficiary of the program because of his or her political beliefs.
4. Require an employee or beneficiary to disclose his or her political affiliation.
5. Offer employment, promotion or benefits under the program as a reward for the support or defeat of any political party or candidate for public or party office; nor may any Subgrantee Recipient create or threaten to create a disadvantage in employment or deprivation of benefits as a penalty for such support.

III. FORMS

None

Req. 106 – Lobbying Activity

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 106

LOBBYING ACTIVITY

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipient employees, volunteers and Board Members, while performing Subgrantee Recipient activities and functions, shall adhere to restrictions against certain types of lobbying, as specified in the Community Services Block Grant (CSBG) Act, <http://codes.lp.findlaw.com/uscode/42/106>. IRS 501(c)(3) [http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/Exemption-Requirements-Section-501\(c\)\(3\)-Organizations](http://www.irs.gov/Charities-&-Non-Profits/Charitable-Organizations/Exemption-Requirements-Section-501(c)(3)-Organizations), State legislation and other related requirements.

II. PROCEDURES

- A. Subgrantee Recipients may conduct the following lobbying-type activity if the cost is otherwise allowable:
1. Lobbying of any person relating to local legislation, i.e., city ordinances, but not to local ballot initiatives or referenda.
 2. Lobbying of Federal Executive Branch official, so long as it is not an attempt to influence a decision to sign or veto Federal or State legislation.
 3. Lobbying to influence State legislation in order to directly reduce cost or to avoid material impairment of the CAA's authority to perform the grant or contract.
 4. Providing a technical and factual presentation of information on a topic directly related to the performance of a grant or contract through hearing testimony, statements or letters to the Congress or State Legislature in response to a documented request. Costs related to this activity for travel, lodging or meals are unallowable.
 5. Nonpartisan, balanced and factually supported research and analysis of legislation or proposed legislation prepared for the CAA and/or the general public, so long as it does not include a "call to action."
 6. Individuals employed by the CAA or connected in some other way may lobby in connection with legislation, as individuals, so long as (s)he does so on his or her own time and does not make use of federally funded CAA facilities.
- B. Subgrantee Recipients may not conduct the following lobbying activities:
1. Attempt to influence the introduction, enactment or modification of any Federal or State legislation through:
 - a. Communications with Federal or State legislators or their staff.

- b. Efforts to influence State or local officials to engage in similar lobbying activity.
 - c. Communications with government officials or employees in connection with a decision to sign or veto legislation.
 - d. Urging members of the general public to lobby or take other action in connection with State or Federal legislation (“grass roots lobbying”).
- 2. Subgrantee Recipients must keep records of lobbying expenditures, which should show appropriate, i.e., private or unrestricted, funding sources to determine their allowability. Time logs need not be kept for any employee who engages in lobbying less than 25% of his or her time.
- C. Subgrantee Recipients are also restricted from the use of both private and Federal funds for grant-related lobbying, i.e., any attempt to influence an officer or employee of a Federal agency or member or employee of Congress, through a communication with or appearance of such person in connection with the awarding of any federal grant, contract or loan.

III. FORMS

None.

Req. 107 – Travel and Per Diem

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 107

TRAVEL AND PER DIEM REQUIREMENTS

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall follow State Travel Reimbursement Act (STRA), Title 74 O.S., Section 500.1, et seq., except as noted, when using ODOC contract(s) funds. However, when a Subgrantee Recipients has existing travel policies more restrictive than ODOC's or when a grant contains more restrictive limitations, the more restrictive limitations shall apply.

State Travel Reimbursement Act: [State of Oklahoma Travel Policy](#)

United States General Services Administration:

http://www.gsa.gov/portal/content/104877?utm_source=OGP&utm_medium=print-radio&utm_term=perdiem&utm_campaign=shortcuts

Subgrantee Recipients shall maintain and adhere to written travel regulations and procedures, which have been approved by their Board of Directors when using contract funds. Such procedures and regulations shall be consistent with (or more restrictive than) these requirements.

Subgrantee Recipient payments for travel by employees, consultants, board members or other persons approved and authorized to perform official travel for the Subgrantee Recipient shall be authorized in advance and supported by properly approved documents covering both travel and, if applicable, per diem. Such payments shall be in conformance with the standards set forth in this document.

Any reference, in this document, to agency, state or department also applies to any agency that is a private corporation or public agency established pursuant to the Economic Opportunity Act of 1964, Pub. L. 88-452, <http://www.gpo.gov/fdsys/pkg/STATUTE-78/pdf/STATUTE-78-Pg508.pdf> which establishes Community Action Agencies or any agency (public or private) contracted by the Oklahoma Department of Commerce to perform services.

Agency employee or official means management, staff, board members and other persons approved and authorized by the Community Action Agency Executive Director to perform official travel for the agency.

Forms and number of copies referenced in these procedures should be complied with in general, i.e., the forms shall be essentially similar, particularly when/where authorizations/approvals are required, dates and/or where other pertinent travel documentation is required.

Where specific agencies, departments, divisions or other offices are referenced, your agency should reference the appropriate department, division, or office within your own agency policies or practices.

II. FORMS

None

Req. 108 – Procurement Policies

I - REQUIREMENT FOR ALL PROGRAMS REQUIREMENT NO. 108 PROCUREMENT PROCEDURES

EFFECTIVE DATE:	JANUARY, 2017
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall comply with the requirements set forth in 2 C.F.R. 200 as applicable, http://www.ecfr.gov/cgi-bin/text idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

II. PROCEDURES

A. DEFINITIONS

1. Responsible Bidders/Vendors: Bidders/Vendors who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement. Consideration shall be given to such matters as bidder integrity, record of past performance, financial and technical resources or accessibility to other necessary resources. Such indicators should be included as part of the specifications and organized for evaluation.
2. Responsive Bids/Offers: Bids/Offers submitted that satisfactorily meet the requirements as specified by the Subgrantee Recipients.
3. Adequate Notice: Sufficient time prior to the stated opening of bids for a bidder to respond to the request for bid or proposal. For the purposes of this Requirement, the minimum adequate notice required shall be at least two weeks from the date of first public advertisement.
4. In the Aggregate: "In the Aggregate" is a reference to purchases of the same product more than one time during the contract period. An example would be the purchase of copy paper. Procurement would be for one time, with multiple purchases; therefore, the "aggregate cost" would be the total of all planned purchases of copy paper during the contract period.

B. STANDARDS

The procurement systems for Subgrantee Recipients shall be written and include, at a minimum, the following standards:

1. Assurance that all procurement transactions shall be conducted in a manner to provide, to the maximum extent practicable, open and free competition.

2. Positive efforts shall be made to utilize small and minority-owned businesses.
 3. Contracts shall be made only with responsible bidders/vendors who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement. 2 CFR 215.13 requires that no subaward or contract be made with certain parties that are debarred, suspended, or other excluded from or ineligible for participation in Federal programs or activities.
 - A. To comply with this requirement, subgrantee recipients must exercise due diligence, prior to entering into a final obligation, that the proposed contractor is not ineligible to receive Federal funds. This can be completed by searching for the proposed contractor at <http://www.sam.gov> via their Vendor Name or by DUNS number. An agency can also pull the Exclusions Extract within SAM. A user guide for obtaining the Exclusions Extract is in the attachments of this manual.
 - B. The Subgrantee Recipient must retain evidence within their files that due diligence was performed to ensure the proposed contractor was able to be paid with Federal funds. This will be verified by ODOC during annual monitoring.
- C. SMALL PURCHASE PROCEDURES (for purchases less than Twenty-Five Thousand Dollars (\$25,000)):
- Small purchases shall be exempt from the advertised process. Subgrantee Recipients shall conduct purchasing procedures in a manner to provide, to the maximum extent practical, open and free competition. Some form of cost or price analysis shall be made and documented in all procurement files. Small purchase procedures are as follows:
1. Purchases under \$5,000: Informal price comparison.
 2. Purchases \$5,001 - \$15,000: Three telephone bids.
 3. Purchases \$15,001 - \$25,000: Three or more written price quotations.
- D. ADVERTISED PROCUREMENT (for purchases of Twenty-five thousand dollars (\$25,000) or more): Procurement records shall include bid selection or rejection and the basis for the cost or price. All documents must be retained in the Subgrantee Recipient's files.
1. Specifications: Prior to advertisement for bids, the specifications should be completed in the form of a bid packet containing the following components:
 - a. A clear, accurate description of the product or service being procured
 - b. All requirements the bidder must fulfill in order for the bid to be evaluated
 - c. Evaluation criteria used to determine the successful bidder.
 2. Solicitation: A notice is to be advertised and distributed as follows:
 - a. Provision of a notice to all known prospective bidders via first-class mail at least

20 days prior to the scheduled bid opening; and

- b. Publication in two (2) consecutive weekly issues of a general circulation newspaper. The first publication must be at least twenty (20) days prior to the date set for opening bids.

3. Selection:

- a. All factors relevant to the procurement shall be included in the bid packet so the selection can be made from those bids that are responsive to the solicitation and awarded to the lowest responsive and responsible bidder.
 - (1) There must be two (2) or more responsive and responsible bids. When only one (1) responsive and responsible bid (single source) is received and all good faith efforts to solicit and maximize the number of bidders have been accomplished, documentation of all solicitation efforts must be maintained in Subgrantee Recipients' files. Subgrantee Recipients shall ensure that the identified market is large enough to solicit responses from enough responsible bidders to create competitive offers/prices.
 - (2) The procurement must lend itself to a firm, fixed-price contract so the selection can be made principally on price.
 - (3) Bids must be opened at a public (open) meeting. During the solicitation, it is advisable to note the date, time and location of the bid opening.
- b. Once the bidder submits a price, the dollar value is not subject to any type of negotiation or change.

4. Documentation:

- a. All solicitation efforts must be documented in the recipient files and should include items such as dated newspaper clippings.
- b. Files must contain a copy of specifications and evaluation criteria, including evaluation criteria forms completed for each bid.
- c. If other than the lowest responsive bid is selected, the Subgrantee Recipient must document reason for selection in procurement records.

E. SOLE SOURCE PROCUREMENT

Sole source occurs when particular goods, materials, or services are available from only one source. All sole source procurements of \$5,000 or more must be approved in advance and in writing by ODOC. The Subgrantee Recipient shall submit a written request to utilize sole source procurement, provide a brief description of the goods or services to be procured and justification for the sole source procurement.

F. EMERGENCY PROCUREMENT

When the urgency for the goods or services will not permit a delay due to competitive procurement, ODOC may authorize emergency procurement. Examples of urgent need are emergency plumbing or electrical work. Authorization may be obtained through a telephone request. If the Subgrantee Recipient cannot obtain telephone approval prior to procuring the goods or services, a written request for approval shall be submitted immediately after the procurement takes place.

G. INVENTORY AND DISPOSITION

1. Equipment/Non-Expendable Property: Any equipment or non-expendable property acquired with a usable life expectancy of more than one year shall comply with this Requirement. See, also, the requirements below and the requirements set forth in 2 C.F.R. 200 as they relate to property management and disposition. Any equipment with an expected usable life of less than one year shall follow the requirements listed under Paragraph B, Materials and Supplies. See, also, certain requirements listed under Lease/Purchase Agreements below in Paragraph D, which may be applicable.

a. Inventory Requirements: All furniture and equipment costing \$500 or more purchased with ODOC contract funds must be kept on inventory at the Subgrantee Recipient's agency. By the end of each calendar year, a comprehensive inventory list, by program, must be submitted to ODOC. Subgrantee Recipient's records should contain all the information mentioned in paragraph (1) below.

(1) Subgrantee Recipients shall maintain an inventory file for all equipment or non-expendable property with a life of more than one (1) year and costing \$500 or more.

The records shall include a description of the property, a serial number or other identification number, the source of funding for the property (including the Federal Award Identification Number), the ODOC contract number, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

(2) A physical inventory of all equipment and non-expendable property purchases made with ODOC contract funds shall be taken and the results reconciled with the equipment records once a year.

(3) Staff who maintains the inventory should not conduct the yearly inventory activities. A definitive line must be present between these duties.

- (4) Equipment purchased by ODOC must be maintained in working condition and the Subgrantee Recipient is responsible for any maintenance/repairs, loss, or theft.
- (5) The Subgrantee Recipient shall maintain the up-to-date inventory listing and submit in accordance with requirements stated in Requirement #113, CONFAX/Documents Submission.
- b. Disposition of equipment (including vehicles) or supplies: The Subgrantee Recipient shall make written request to ODOC when disposing of a vehicle, equipment, or supplies, purchased with Federal funds. ODOC will then provide specific disposition instructions.

H. MATERIALS AND SUPPLIES

This section refers to expendable materials and supplies with an expected usable life of less than one year. The cost of the materials or supplies shall be based on the aggregate amount of the purchases, planned or potential, over a one-year period and not based on a one-time purchase that may be recurrent.

1. Procurement Procedures:

- a. Expendable materials and/or supplies with an expected usable life of less than one year costing less than twenty-five thousand dollars (\$25,000) shall be purchased using Small Purchase procedures. {Reference Section II C}
- b. The purchase of expendable materials and supplies with an expected life of less than one year costing above twenty-five thousand dollars (\$25,000) must use Advertised Procurement procedures. {Reference Section II D}
- c. Inventory Requirements: Subgrantee Recipients shall establish and maintain an inventory system to control materials and supplies purchased in quantity.

I. SERVICES

Services, for the purposes of this section, refer to services provided by outside professionals or consultants and include such items as accounting or payroll services, employee training, legal consultations, audit services and maintenance-related services such as plumbing, equipment, HVAC or electrical work.

1. Procurement Procedures: For the purchase of services costing:

- a. Less than \$5,000: Informal price comparisons.
- b. \$5,001 through \$15,000: Three telephone bids. Subgrantee Recipient completes Telephone/Request for Quotation.
- c. \$15,001 through \$25,000: Subgrantee Recipient will be required to obtain three (3) or more written price quotations from vendors. The vendor completes

Request for Quotation (Form 18).

- d. Above \$25,000: Advertised Procurement procedures. Procurement of Services costing more than \$25,000 must be approved in advance by ODOC, using Contractor Request for Contract Services (Form 21).
2. Contract Periods: All contracts for services must have a specific contract period. If provided for in the original procurement, the original contract may be extended, by mutual agreement of the parties, up to five (5) years.

J. RENTAL OF REAL PROPERTY

1. If a Subgrantee Recipient is planning to move (rental) or is planning to rent additional space, the following procurement procedures must be used for real property; and based on the full term of the lease:
 - a. Less than \$5,000: Informal price comparison.
 - b. \$5,001 through \$15,000: Three telephone bids.
 - c. \$15,001 to \$25,000: the Subgrantee Recipient will be required to obtain three or more written price quotations from vendors. The vendor completes Request for Quotation (Form 18).
 - d. \$25,000 and up: Use Advertised Procurement procedures.
2. A written lease or rental agreement shall be maintained on file. The agreement shall specify the terms of the agreement, landlord/tenant responsibilities and termination and renewal procedures. The lease may be extended, by mutual agreement of the parties, up to five (5) years.

J. PROGRAM INCOME

1. Program Income, as defined by 2 CFR 200.80 is gross income earned by the recipient that is directly generated by supported activity or earned as a result of federal award activities, during the award period. Program Income includes income from fees for services performed, the use of rental or real personal property acquired under the federally funded project, the sale of commodities or items fabricated under an award, license fees and royalties on patents and copyrights, and from payments of principal and interest on loans made with federal funds. Program Income does not include rebates, credits, discounts, etc., or interest earned on any of them.
 - a. Program Income must be treated as an addition to program funds and is subject to the same rules as appropriated funds.
 - (1) **Program Income** must be accounted for separately and expended before any other program funds are spent. Program Income is tracked as a separate line item and is not included in ODOC contract budgets or expenditure reports.

- (2) Verification of Program Income, received within an annual budget period, must be submitted to an ODOC Program Representative (liaison) for approval.
- (3) Accounting records verifying the use of Program Income must be made available to ODOC staff upon request.

- b. **For all federal funds, proceeds from the sale of real property, equipment (including vehicles), or supplies are not program income;** such proceeds are handled in accordance with 2 CFR 200.311 Real Property, 2 CFR 200.313 Equipment, and 2 CFR 200.314 Supplies, as applicable.

K. VEHICLE PROCUREMENT

1. For vehicle purchases funded with Community Service Block Grant (CSBG) grant dollars, ODOC has elected to impose the procurement standards of OMB, and is electing to default to 45 CFR 75 for ODOC approval (rather than the Uniform Guidance which states the Federal agency approves over \$5,000). *This requirement applies only to CSBG funded purchases. For vehicles purchased and/or used for any other program, you must adhere to the vehicle purchase and usage requirements of those programs.*
2. The procurement process for all Vehicle purchases shall follow the following standards: Subgrantees are required to conduct an *Analysis of Need and Usage* when considering a vehicle purchase. All factors relevant to the procurement of vehicles must avoid acquisition of unnecessary or duplicative items and/or purchasing a higher-cost vehicle than is necessary.
 - a. A *Cost Analysis* must be conducted to determine cost efficiency of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. Subgrantees must utilize a cost analysis tool such as: <https://calculator.me/vehicle/operating-cost.php> or an equivalent analysis tool to assure the purchase is economical.
 - b. Costs must be allocated to the programs that receive benefit from the costs on a relative basis. This would apply to leases and purchases. CSBG has additional flexibilities to be used to support other programs that serve the same population.
 - c. Costs for vehicles must be reasonable. This does not mean that the Subgrantee is required to accept the lowest bid/cost, but that the decision should be prudent. This would apply to leases and purchases.
 - d. All vehicle purchases must receive ***prior*** written approval from ODOC. Subgrantees must submit a written request for vehicle purchases to ODOC that includes the following:
 - i. Analysis of Need: written narrative describing the need for the vehicle and how it shall be used
 - ii. Cost Analysis to determine cost efficiency of lease versus purchase alternatives
 - iii. Financial information such as price of vehicle, amount requested to be paid by ODOC contract(s) and amount to be paid with use of other agency funds

- e. All other CAA and ODOC policies for equipment tracking, disposition, usage and maintenance must be followed
- f. Subgrantees are required to follow established ODOC procurement procedures for all vehicle purchases:
 - i. Purchases under \$5,000: Informal price comparison.
 - ii. Purchases \$5,001 - \$15,000: Three telephone bids.
 - ii. Purchases \$15,001 - \$25,000: Three or more written price quotations.
 - iii. Purchases over \$25,000 – Advertised Procurement
- g. Agencies may opt to use the State Contract for vehicle purchases in lieu of bidding out vehicles with local vendors.
- h. As part of internal controls, agencies must have written vehicle usage procedures.

III. FORMS

- 1. Telephone/Request for Quotation (Form 18)
- 2. Contractor Request for Contract Services – Over \$25,000 (Form 21)

IV. RESOURCES

- 1. [2 CFR 200.313 Equipment](#)
- 2. [2 CFR 200.314 Supplies](#)

Req. 109 – Financial Management

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 109

FINANCIAL MANAGEMENT

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall maintain records and accounts, including property, personnel and financial records that properly document and account for all contract funds. All record keeping shall be in compliance with State and Federal regulations 2 C.F.R. as applicable, http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2tab_02.tpl and generally accepted accounting principles.

II. PROCEDURES

A. FINANCIAL SYSTEM

1. Subgrantee Recipients shall ensure the financial system used to administer ODOC contracts conforms to the following standards:
 - a. Accurate, current and complete disclosure of the financial results of the ODOC programs is provided in accordance with specified State and Federal requirements.
 - b. Records are maintained that adequately identify the source and application of funds for each ODOC-supported activity, including any applicable matching funds.
 - c. Effective control and accountability is maintained for all funds, property and other assets.
 - d. Accounting records are maintained with adequate supporting documentation.
 - e. Internal controls are established to eliminate fraud and abuse.
2. Subgrantee Recipients may request ODOC review of existing procedures to determine compliance with this entire Requirement.
3. Subgrantee Recipients shall implement and maintain a written accounting procedure manual that adequately describes specific procedures, processes and requirements necessary for the Subgrantee Recipients to be in conformance with standards 1.a through 1.e as listed above.
4. The accounting manual should include any procedures or processes unique to the Subgrantee Recipient or infrequent but relevant to the accounting system.

B. ACCOUNTING SYSTEM REQUIREMENT

Subgrantee Recipients shall establish and maintain a separate set of self-balancing accounts for each ODOC contract, in accordance with written procedures, which will permit the Subgrantee

Recipients to properly account for all funds in conformance with generally accepted accounting principles. The following requirements shall apply:

1. Books of original entry shall be utilized to account for contract funds and any required matching funds.
2. Accounting records shall include the cash receipts journal, cash disbursement journal, the general journal and general ledger.
 - a. The accounting records shall utilize a payroll register for any employees paid with ODOC funds.
 - b. The general ledger shall include separate expenditure accounts for each approved budget line item as shown in the contract budget or subsequent revisions.
3. A monthly trial balance shall be performed when the books are closed each month. The trial balance shall become a part of the accounting records.
4. Monthly Expenditure Reports submitted to ODOC every month, **regardless of whether there are expenditures or not**, must be taken from the original books of account and be directly traceable to the general ledger expense accounts.
5. Any costs shared between programs must be properly allocated. The method of allocation must be generally accepted, reasonable and documented. An agency cost allocation plan should be established.
6. Accounting records must always be posted up to date.
7. All receipts recorded in the receipts log shall be reconciled regularly with the cash receipts journal, the general ledger and bank statement.
8. All general ledger entries must be clearly traceable to appropriate source documentation.
9. Appropriate source documentation is defined as any approved original documents that clearly indicate costs allowable and allocable to the program. Examples of supporting documentation include: Original invoices, fee contracts, progress billings and employee time sheets.
10. All paid invoices must be defaced by indicating the check number, date paid and "PAID" on the invoice. Copies of the purchase order and check shall be attached to the invoice before filing.
11. All supporting documentation must be filed in an orderly manner in accordance with the Subgrantee Recipient's written accounting procedures.
12. Accounting files shall include:
 - a. Copies of all Monthly Expenditure Reports and Requests for Funds submitted to ODOC.
 - b. All correspondence relating to financial management of the contract.
 - c. Employee time sheets showing hours worked and charged to ODOC contracts when applicable.
13. All manual accounting records shall be maintained in ink for permanence.
14. Correction fluid (whiteout, etc.) shall not be used to cover transpositions or other errors in the original books of account. A single line should be drawn through the mistake or error and the correct figure should be recorded in ink. This will allow clear identification

of the error. **Errors found after the books are closed for any given month must be corrected by general journal entry in the month the error is found.** This also applies to electronic (computer software) accounting systems.

15. Bank statement reconciliations shall be performed on a monthly-basis.
The individual performing the reconciliation shall initial and date it when complete.
16. Electronic Signatures: Agency will have a policy to ensure only appropriate staff have access to electronic signatures.
17. Passwords – Phones, computers, etc.- Agency will have a policy to ensure only appropriate staff have access to electronic signatures.

C. INTERNAL CONTROL REQUIREMENTS

Subgrantee Recipients shall implement the following controls to safeguard all funds and assets of the ODOC contract:

1. Blank checks and credit cards must be maintained in locked cabinets or files.
2. Undelivered checks should be kept in a locked cabinet or safe until delivery.
3. When a signature stamp is used for checks or correspondence, access to the signature stamp should be limited to authorized personnel and the stamp should be maintained in a lockable cabinet or drawer.
4. Deposits of ODOC funds shall be made by someone other than the accountant or bookkeeper maintaining the ODOC accounting records.
5. Incoming checks should be stamped "For Deposit Only" by the person opening the mail and recorded in a receipts log that identifies the check number, amount and source of funds.
6. Bank reconciliations should be performed by someone other than the accountant responsible for ODOC accounting records or for making deposits.

D. CASH MANAGEMENT REQUIREMENTS

Subgrantee Recipients shall implement the following to ensure proper cash management of Federal and State funds:

1. ODOC funds cannot be placed in petty cash funds.
2. All ODOC funds received shall be promptly deposited in the proper bank account. The Subgrantee Recipients shall designate with the use of an Electronic Funds Transfer Authorization form, the appropriate account to be used for any program utilizing electronic transfer of funds.
3. Subgrantee Recipients shall not maintain excessive cash on hand.
 - a. Reimbursement Contracts: Subgrantee Recipients shall have on file documentation for expenditures reported on any Request for Reimbursement. Funds paid on a reimbursed basis are considered expended when the Monthly Expenditure Report is submitted.
 - b. Cash Advances: For those programs that allow for advances, the

Subgrantee Recipients shall request only an amount sufficient to cover immediate anticipated expenditures. Requests for funds may be made at any time funds are needed throughout the month. No funds will be released for contracts with delinquent expenditure reports. Expenditure reports shall be submitted each month, even when no expenses were incurred [(Section II (B) (4)].

4. The Subgrantee Recipients shall verify cash on hand on a daily - basis and is responsible for coordinating with its bank to determine when electronic transfer of funds has occurred.
5. All vendor invoices must be verified for accuracy. The reviewer should initial and date the invoice.
6. All vendor invoices that allow a discount for early payment should be paid in the discount period if administratively feasible.
7. All checks paid with ODOC funds must be pre-numbered.
8. All checks paid with ODOC funds must be completely- filled out before they are signed.
9. Voided checks must be filed with copies of checks or other accounting documentation for accountability.

E. ALLOWABLE/UNALLOWABLE COSTS

Costs charged to each program shall be in accordance with 2 C.F.R. as applicable, The Subgrantee Recipients must ensure that all costs are properly accounted for in accordance with the following definitions:

[eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

1. Operation costs may include any costs directly associated with the program activity. Examples of operations costs include, but are not limited to: Personnel costs (payroll and fringe benefits) for operational staff time, travel, supplies, equipment and space costs directly related to the program.
2. Administrative costs are those costs indirectly related to a program activity. Examples of administrative costs include but are not limited to: Accounting and auditing costs, legal fees, liability insurance and fidelity bond costs, personnel costs (payroll and fringe benefits) for staff time, travel, supplies, and equipment and space costs indirectly related to the program.

III. FORMS

None.

Req. 110 – Training and Technical Assistance

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT 110

TRAINING AND TECHNICAL ASSISTANCE EFFECTIVE

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Training and technical assistance will be provided for Subgrantee Recipients to ensure the continued quality performance of ODOC Subgrantee Recipients and to ensure performance of activities useful to advance the purpose of the contracts. The Subgrantee Recipients shall ensure the attendance of any person performing services under the contract whose presence is requested.

II. PROCEDURES

A. DEFINITIONS

Training and technical assistance will be considered separate and distinct functions in accordance with the following definitions.

1. Training:

- a. Training is an instructional or educational event on a general topic that provides the opportunity for participants to gain information, increase program management skills and define program objectives.
- b. Training events are designed for groups to share knowledge and experience.
- c. Training may be held virtually, on-site, at ODOC offices or some other location

2. Technical Assistance:

- a. Technical assistance is a problem-solving activity designed to provide Subgrantee Recipients with an immediate resolution, or approach to a resolution, of a specific problem or set of problems.
- b. Technical assistance, providing resources and information, may be held virtually, on-site, at ODOC offices, by telephone or by written communication.

B. Requests for training shall be based on the learning needs for a designated job category with specific topics and objectives or desired outcomes clearly stated.

C. Requests for technical assistance shall be based on a specific problem in a designated job

category and shall involve Subgrantee Recipient's staff affected by the problem and staff involved in developing resolutions. It will also be based on a request for resources or information related to a specific problem or need.

- D. Training may be requested by contacting your ODOC representative. You may be requested to identify needs, topics, expected objectives/outcomes; participants expected and preferred delivery method. Suggested dates and location must be submitted to confirm telephone requests.
- E. Technical assistance may be requested by contacting your ODOC representative by. You may be asked to identify the problem, persons affected by the problem who are involved in developing resolutions, preferred delivery method and suggested dates and location, or lists, information, and other resources needed.
- F. Requests may also be initiated by the Subgrantee Recipients based on internal evaluation or needs assessment.
- G. Training and technical assistance provided by ODOC, or any of its partners, are documented and reported as a part of the annual CSBG Annual Report.

III. FORMS

None.

Req. 111 – Conflict of Interest

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT 111

CONFLICT OF INTEREST

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

No persons who have exercised any functions or responsibilities with respect to activities assisted with ODOC funds may obtain a financial interest in or benefit from an ODOC activity or have an interest in any contract subcontract or agreement, either for themselves or for those with whom they have family or business ties, during their tenure or for one year thereafter.

A. PERSONS COVERED

The conflict-of-interest provisions apply to any person who is an employee, agent, consultant, officer or elected or appointed official of the agency receiving ODOC funds.

B. EXCEPTIONS

Upon the written request of the Subgrantee Recipient, ODOC may grant an exception on a case-by-case basis when it determines the exception will serve to further the purposes of the ODOC programs and the effective and efficient administration of the Subgrantee Recipient's program or project. An exception may be considered only after the Subgrantee Recipients has provided an assurance that:

1. A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made.
2. An opinion of the Subgrantee Recipient's attorney that the interest for which the exception is sought would not violate State or local law.

C. FACTORS TO BE CONSIDERED FOR EXCEPTIONS

In determining whether to grant a requested exception after the agency has satisfactorily met the requirements of paragraph B of this Requirement, ODOC will consider the cumulative effect of the following factors, where applicable:

1. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available

2. Whether the person affected is a member of a group or class of low-income persons intended to be the beneficiaries of the assisted activity. If that person is a member of such a class or group, the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class
3. Whether the affected person has withdrawn from his or her functions or responsibilities or the decision-making process with respect to the specific assisted activity in question
4. Whether the interest or benefit was present before the affected person was in a position as described in Paragraph A of this Requirement
5. Whether undue hardship will result either to the Subgrantee Recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and
6. Any other relevant considerations.

II. FORMS

None.

Req. 112 – Reporting

**REQUIREMENTS FOR ALL PROGRAMS
REQUIREMENT NO. 112
REPORTING**

EFFECTIVE DATE:	OCTOBER 1, 2019
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENTS

- A. Subgrantee Recipients shall furnish to ODOC narrative, statistical, and financial reports related to the contract on forms and at such times as may be required.

II. TERMS AND DEFINITIONS

Advance

An advance is a request for funds, it does not mean that the funds have to be requested in advance. Funds can be requested in advance of expenditures incurred, but they can also be requested after (as reimbursement).

Reimbursement Claim

A Reimbursement Claim is a payment request for state contract expenditures that have already been incurred by the Subgrantee Recipient. Reimbursement Claims cannot exceed the actual expenditures or the cumulative one-twelfth (1/12th) year to date amount or whichever is less.

III. PROCEDURES

- A. Advance payment requests should be submitted five working days before needed. Advances will not be processed if current expenditures reports are not received by the due dates listed below.
- B. **An expenditure report must be submitted each month, whether or not funds have been expended.**
- C. Budgets and Budget Revisions must be submitted and approved prior to implementing expenditure changes.
- D. Reports shall be submitted to ODOC in an OKGrants form (unless otherwise noted) as listed in the program reporting requirement tables below. All expenditure and advances must adhere to Requirement 108 (D) Cash Management Requirements.

U.S. Office of Community Services - Community Service Block Grant			
Contract Period: January 1 – September 30 of following year			
Report Name	Due Date(s)	Frequency	Reporting Period
Expenditure Report	20th	Monthly	Previous Month
Advance	As Needed	As Needed	As Needed

Closeout Certification	November 30th	Annually 60 calendar days from end of contract	Contract Period
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State Appropriated Funds for Community Action Agencies			
Contract Period: July 1 – June 30			
Report Name	Due Date(s)	Frequency	Reporting Period
Reimbursement Claim	20th	Monthly	Previous Month
Closeout Certification	August 30th	Annually 60 calendar days from end of contract	Contract Period

State Appropriated Funds for Community Action Agencies – Head Start			
Contract Period: July 1 – June 30			
Report Name	Due Date(s)	Frequency	Reporting Period
Reimbursement Claim	20th	Monthly	Previous Month
Annual Performance Report [Form 1]	August 30th	Annually uploaded as a part of Closeout Certification	Contract Period
Closeout Certification	August 30th	Annually 60 calendar days from end of contract	Contract Period

State - Rx for Oklahoma			
Contract Period: July 1 – June 30			
Report Name	Due Date(s)	Frequency	Reporting Period
Reimbursement Claim	20th	Monthly	Previous Month
Quarterly Programmatic Reports	See RX for Oklahoma Request for Proposal (RFP)		
Closeout Certification	August 30th	Annually; 60 calendar days from end of contract	Contract Period

VI. FORMS

Form 1 SAF HS Annual Performance Report

V. ATTACHMENTS

VI. RESOURCES

- OKGrants Resources <https://okcommerce.gov/community/OKGrants/>

Req. 113 – Requirements for Boards of Directors

I - REQUIREMENTS FOR ALL PROGRAMS
REQUIREMENT NO. 113
REQUIREMENTS FOR BOARDS OF DIRECTORS

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients receiving funds under CSBG shall comply with the requirements for Boards of Directors specified in 675 (c) (3) of the CSBG Act, <http://codes.lp.findlaw.com/uscode/42/106> provisions of the contract and assurances provided by the Subgrantee Recipient.

II. PROCEDURES

The following standards shall be incorporated into the By-Laws of all Boards of Directors:

A. BOARD SIZE

Boards shall consist of no fewer than 12 nor more than 36 members. The Subgrantee Recipient's By-Laws should specify the number of Board Members.

B. COMPOSITION

Board composition must be one-third public sector, at least one-third representatives of the low-income community and the remainder composed of representatives of the private sector.

1. Public Sector: One-third of the members of the Board shall be elected public officials currently holding office or their representatives. If, however, the number of elected officials reasonably available and willing to serve is less than one-third of the membership, appointed public officials may be counted in meeting the one-third requirement.
 - a. The term "elected public official" refers to a duly elected representative of the State, a municipality, county, a tribal government or State political subdivision.
 - b. The term "appointed public official" refers to employees of public agencies and members of boards and commissions established under State and/or local law who have responsibility and authority to determine and implement the policies of those agencies, their boards or commissions.
 - c. An elected or appointed public official may designate another person to serve on

the Board as their representative provided the representative is entitled to act on behalf of the public official represented with regard to the business of the Board.

2. Low-Income Sector: At least one-third of the Board shall be a democratically selected representative of low-income persons residing in the service area.
3. Private Sector: The remainder of the members shall be officials or members of business, industry, labor, religious, welfare, education or other major groups and interests in the service area.

C. SELECTION PROCEDURE

The selection procedures must be in writing and documented to show Board involvement in the selection of the public and private sector members and the involvement of the low-income community in the selection of low-income members.

1. Alternates for the public, low-income and private sectors may be selected and may have voting privileges provided they are selected in the same manner as the Board member they alternate for. The Agency must have an established By-Law provision that allows alternates to vote in the absence of the regular member and to be counted as part of the quorum requirements.
2. Vacancies on the Board shall be filled in a manner consistent with the original election/selection process. Agencies are encouraged to fill all vacancies as soon as possible, preferably within two months. Alternates may fill the remainder of any term for the sector they were selected to represent.

D. COMMITTEES AND SUBCOMMITTEES

Committees and subcommittees may be established by the Board to accomplish the business of the Board and the Agency provided:

1. Actions of any committee are ratified by the Board
2. Standards regarding meeting and quorum requirements as stated later in this requirement (section H.2-7) apply to all Board subgroups; and
3. Decisions relating to the acceptance/denial of a specific applicant for weatherization services made by a duly composed Weatherization Policy Advisory Council need not be ratified by the Board except in instances of an applicant appeal that necessitates Board action.

E. TERMS OF SERVICE

Each term shall not exceed three years and each member must be removed at the end of each term. The member may be re-selected/appointed or a new member may be selected/appointed. This procedure must be in accordance with "Selection Procedures" previously stated. Limitations on the number of terms a member may serve shall be determined by the Board of Directors and must be in writing as part of the Agency's By- Laws.

F. REMOVAL OF MEMBERS

1. Public officials or their representatives must be removed from the Board when the public official no longer retains the designated office/position. An individual appointed by a body of public officials, such as a commission or council, shall be removed from the Board upon change in composition of the appointing body. The public sector representative may be reappointed, or a new representative may be appointed by the newly selected/elected public official(s).
2. The Board shall establish and include in its By-Laws the grounds and procedures for the removal of low-income and private sector representatives.

G. BOARD COMPENSATION

1. Unless compensated from another source, Board members may be reimbursed for travel costs incurred in attending Board or committee meetings.
2. Reimbursement for travel shall be in accordance with current travel provisions. H.

MEETING AND QUORUM REQUIREMENTS

1. The Board of Directors shall meet as often as the Agency or Board's business may require but not less than six (6) Board meetings shall be held within any 12-month period.
2. The required quorum shall be more than 50 percent of the current total membership of the Board.
3. In the absence of specific rules of order, Robert's Rules of Order shall apply.
<http://www.robertsrules.org/>
4. The Board shall provide its members with a notice of and the agenda for all meetings in advance of the meeting date.
5. The Board shall keep minutes for each meeting that include a sign-in sheet, record of votes by members on each motion and a record of absences, categorized as excused or unexcused.
6. Minutes of the previous meeting shall be distributed to all members before the next meeting

and shall be made available to the public upon request.

7. All Board meetings shall be in compliance with the Oklahoma Open Meeting Act, 25 O.S. §301, et seq., and 25 O.S. §§301-314, as revised.

<http://www.odl.state.ok.us/lawinfo/docs/2006-LibraryLaws-PartD.pdf>

I. CODE OF CONDUCT

A Code of Conduct shall be established to ensure the appropriate conduct by members of the Board. Such Code shall prohibit the promotion of or involvement in nepotism, conflict of interest and discriminatory practices.

J. POWERS, RESPONSIBILITIES AND ROLE OF THE BOARD

The Board is to be the governing policy-making entity of the Agency.

1. Powers and Responsibilities: The powers and responsibilities of the Board shall include but not be limited to:

- a. Appointing an Executive Director
- b. Evaluating the Executive Director annually
- c. Determining the rules of procedures for the Board
- d. Determining the policies under which the Board and agency shall operate
- e. Determining, within regulations and policies, the major fiscal, personnel and program policies
- f. Reviewing and approving all programs and expenditures
- g. Considering and approving all program proposals and budgets
- h. Enforcing compliance with all conditions on grants
- i. Determining overall program plans and priorities
- j. Determining the use of all discretionary money
- k. Compliance with the Oklahoma Open Meeting Act, 25 O.S. §301, et seq., and 25 O.S. §§301-314, as revised; <http://www.odl.state.ok.us/lawinfo/docs/2006-LibraryLaws-PartD.pdf>
- l. Compliance with the Code of Conduct
- m. Review the agency's mission statement at least every five years and ensure the mission addresses poverty and the agency's program and services are in alignment with the mission
- n. Ensure the agency's community action plan is outcome based, anti-poverty focused and ties directly to the Community Needs Assessment
- o. Ensure the agency has a written succession plan in place for the CEO/ED approved by the board that contains procedures for covering an emergency, unplanned short-term absence as well as the process for filling a permanent vacancy
- p. Review the agency's annual audit and address all findings

2. Role of the Board: The role of the Board shall include but not be limited to:
 - a. Being a catalyst for positive change in the community
 - b. Bringing the problems and needs of the community to the Board for discussion
 - c. Looking at options for solving some of the problems or fulfilling the needs of the community
 - d. Examining issues affecting the quality of life in the community
 - e. Raising money
 - f. Serving as an advocate for clients and being a catalyst for institutional change in institutions that serve them
 - g. Serving as a link between the Board of Directors and the people or groups represented
 - h. Serving as a good public relations advocate for the programs, projects and activities of the Agency
 - i. Recruiting volunteers and space for programs and activities; and
 - j. Mobilizing resources for the entire community.

K. LIMITATIONS OF THE BOARD

Individual Board members do not have the authority to direct, coerce or in any way influence the actions of the Agency staff.

L. BOARD TRAINING

1. Subgrantee Recipients receiving funds under CSBG shall develop and implement an annual Board Training Plan (using ODOC's required Board Training template) and submit with its CSBG Application for funding.
2. Subgrantee Recipients receiving funds under CSBG are responsible for ensuring its board members receive:
 - a. a structured orientation (*Organizational Standard 5.7*) within 6 months of being seated.
 - b. training on their duties and responsibilities every two years (*Organizational Standard 5.8*).
 - c. on-going training and development that is in alignment with IM 82.
 - d. training sessions for Board members must focus on skill building and the professional development of Board members. **Information sharing does not qualify as training.**
3. Subgrantee Recipients receiving funds under CSBG are responsible for assessing the on-going training needs of its board members. Suggested training topics include, but are not limited to:
 - a. ROMA and ROMA Application
 - b. CSBG Act & CSBG Framework
 - c. Community Needs Assessment
 - d. Community Action Plan

- e. Strategic Planning
- f. Program Evaluation
- g. Analyzing Data and Assessing Results (Outcomes)
- h. Agency-wide budgeting
- i. Financial Statements and Grant Reporting
- j. Financial Oversight & Determining Fiscal Health
- k. How to interpret an audit report
- l. CSBG Organizational Standards
- m. Board Recruitment and Retention
- n. Evaluating the Performance of the Executive Director & setting goals
- o. The Role of Board Minutes
- p. How Boards can evaluate their own board performance
- q. IM 82 Tripartite Boards
- r. Board Roles and Responsibilities
- s. Open Meeting Act

M. BOARD FILES

Selection documentation for Board files must be maintained in writing for each seated member and should contain a minimum of:

Public and Private:

1. A letter of request from the agency to the entity providing the Board member.
2. A letter from the entity to the agency providing the name of the chosen member.
3. A copy of agency Board minutes showing Board involvement in the selection of the member.

Low-Income:

1. A letter of request from the agency to the entity providing the Board Member.
2. Democratic selection documents such as a public posting, newspaper clippings, agenda, open meeting minutes, sign-in sheets, or ballots showing a democratic selection process.
3. A letter to the agency providing the name of the chosen member.

III. FORMS.

None

IV. Resources

ODOC's CAA Implementation Manual

https://okcommerce.gov/assets/files/grants/CAA_Contractor_Implementation_Manual.pdf

Office of Community Services' IM 82

<https://www.acf.hhs.gov/ocs/resource/im-no-82-tripartite-boards>

Community Action Agency Board Members TOOLKIT:

<https://www.centerforcommunityfutures.com/caa/board-members-toolkit>

CAPLAW Bylaws Toolkit, *Updated 2009*

<https://resources.capl原因.org/resources/bylaws-toolkit>

Resources from the Organizational Standards Center of Excellence (OSCOE):

http://bit.ly/OSCOEresources_GovernanceGuide

CSBG Organizational Standards Category 5 Board Governance Technical Assistance Guide:

[Organizational Standards Technical Assistance Guide – Category 5: Board Governance \(Public\) | National CAP \(communityactionpartnership.com\)](#)

Req. 114 – CONFAX

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT 114

CONFAX (Document Submission)

EFFECTIVE DATE:	JANUARY, 2017
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

- A. Subgrantee Recipients shall submit information as required to document contract compliance.
- B. Subgrantee Recipients shall maintain a Community Action Agency Implementation Manual as official policy for the administration of programs.

II. PROCEDURES

A. CONFAX

1. All CONFAX documents shall be kept current as per the guidelines below.
2. All CONFAX documents shall include effective dates.
3. If CONFAX items are paperless within an agency or uploaded to the Subgrantee Recipients' website, a link to the documents may be submitted in lieu of the documents themselves.
4. Documents or an updated link shall be submitted upon any revision.
5. Following is a list of required documents to be submitted. Any necessary forms are provided annually in the CSBG Application.

Submit with annual CSBG application and as updated:

- Board Membership Roster
- Organization Chart
- By-Laws (also uploaded in Organizational Standards system)

Submit annually during monitoring review and as updated:

- Affirmative Action Plan
- Equipment Inventory List (purchased with ODOC funds)
- Articles of Incorporation (when requested)
- Personnel Policies (also uploaded in Organizational Standards system)
- Board Committee Membership Lists
- List of all satellite offices, including address and telephone number

Submit within 30 days after board meeting (uploaded in Organizational Standards system):

- Board packets, approved board minutes (signed by the authorized board representative and including the sign-in sheet and voting record)

B. SUBGRANTEE RECIPIENT'S IMPLEMENTATION MANUAL

1. Agencies must ensure proper staff access to the online Subgrantee Recipient's Community Action Agency Implementation Manual, or
2. Agencies wishing to maintain a hard copy of the manual shall ensure that it is maintained in an orderly manner with each manual change inserted promptly.

III. **FORMS**

None

Req. 115 – Revisions to Budgets and Program Plans

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 115

BUDGET AND PROGRAM PLAN REVISIONS EFFECTIVE

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENTS

In accordance with 2 C.F.R. 200 as applicable, http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl. Subgrantee Recipients are required to report deviations from budget and program plans, and request **prior** approvals for budget and program plan revisions.

Contracts with the Oklahoma Department of Commerce/ Community Development (ODOC/CD) require that revisions in work program activities which result in revisions to the budget line items of (+) or (-) 10% shall be submitted for approval by authorized staff.

II. PROCEDURES

Subgrantee Recipients shall request **prior** approval from ODOC/CD for one or more of the following program or budget related reasons:

- A. If expenditures year to date will change a line item budget of \$1,000 or more by +/- 10%, a revised budget is required.
- B. If the line item budget is at or under \$1,000 and expenditures year to date exceed 50% of the budget line item, a revised budget is required.
- C. If there is a change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior approval), a written justification is required.
- D. If there is a change in the key person specified in the application or award document a written statement describing the change is required.
- E. If the budget includes costs that require prior approval in accordance with 2 C.F.R. as applicable, submit the request in writing.
http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
- F. Unless described in the application and funded in the approved awards, the sub award

transfer or contracting of any work under an award must receive prior written approval of ODOC. This provision does not apply to the purchase of supplies, material, equipment, or general support services.

H. Budgets revisions after the end of the contract period are prohibited.

I. Modification Justification: When requesting a contract modification or budget revision in OKGrants, a justification must be provided. The justification must include a rationale for the change. Examples:

- Justified: The agency received a new contract that funds one-half of our Outreach Coordinator's salary, which is currently funded on this contract. We would like to move \$20,000 currently budgeted for that position to fund a part-time clerk for our Accounting office.
- Unjustified: -\$1200 salary, -\$350 fringe, +\$600 supplies; +\$950 travel
- Unjustified: Add Data Entry Clerk to budget. Other revisions as needed.

III. FORMS

None.

Req. 116 – Records Retention

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 116

RECORDS RETENTION EFFECTIVE

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

In accordance with 2 C.F.R. as applicable, Subgrantee Recipients will retain records in the manner outlined below. http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2tab_02.tpl

II. PROCEDURES

- A. Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency. The only exceptions are the following:
 - a. If any litigation, claim, or audit is started before the expiration of the three-year period, the records shall be retained until all litigation, claims or audit findings have been resolved and final action taken
 - b. Records for real property and equipment acquired with Federal funds shall be retrained for three years after final disposition
 - c. When records are transferred or maintained by the Federal awarding agency, the three-year retention requirement is not applicable to the recipient
 - d. Indirect cost rate proposals, cost allocation plans, etc. as specified below (Section F)
 - e. The retention period can be longer based upon advice of legal counsel or professional accountants or auditor
- B. Copies of the original records may be substituted for the original records if authorized by the Federal awarding agency.
- C. The Federal awarding agency shall request transfer of certain records to its custody from recipients when it determines that the records possess long term retention value. However, to avoid duplicate recordkeeping, a Federal awarding agency may make arrangements for recipients to retain any records that are continuously needed for joint use.
- D. The Federal awarding agency, the Inspector General, Comptroller General of the United States, or any of their duly authorized representatives, have the right of timely and unrestricted access to any books, documents, papers, or other records of recipients that are pertinent to the award, to conduct audits, examinations, excerpts, transcripts and copies of such documents. This right also includes timely and reasonable access to a recipients' personnel for the purpose of interview and discussion related to such documents. The rights of access are not limited to

the required retention period but shall last for the duration that records are retained.

- E. Unless required by statute, no Federal award agency shall place restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, except when the Federal awarding agency can demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to the Federal awarding agency.
<http://www.justice.gov/oip/blog/foia-update-freedom-information-act-5-usc-sect-552-amended-public-law-no-104-231-110-stat>
- F. Indirect cost rate proposals, cost allocation plans, etc. – Section (a) and (b) below apply to the following types of documents and their supporting records: Indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - a. If submitted for negotiation - If the recipient submits to the Federal awarding agency or the subrecipient submits to the recipient the proposal, plan, or other computation to form the basis for negotiation of the rate, then the three-year retention period for its supporting records starts on the date of such submission.
 - b. If not submitted for negotiation - If the recipient is not required to submit to the Federal awarding agency or the subrecipient is not required to submit to the recipient the proposal, plan, or other computation for negotiation purposes, then the three-year retention period for the proposal, plan or other computation and its supporting records starts at the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

III. FORMS

None.

Req. 117 – CSBG Organizational Standards

I - REQUIREMENTS FOR ALL PROGRAMS

REQUIREMENT NO. 117

CSBG ORGANIZATIONAL STANDARDS

EFFECTIVE DATE:	JANUARY 2017
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. **CONTRACTUAL REQUIREMENT**

CSBG organizational standards provide a standard foundation of organizational capacity for all CSBG Eligible Entities (subgrantee recipients). The Federal Office of Community Services' Information Memorandum (IM) 138 provides direction to States and subgrantee recipients on establishing organizational standards by FY 2016 and includes the final wording of the standards developed by the OCS-funded organizational standards Center of Excellence (COE). Section 678B of the CSBG Act requires States to establish "performance goals, administrative standards, financial management requirements, and other requirements that ensure an appropriate level of accountability and quality among the states Community Action Agencies.

The COE-developed organizational standards are comprehensive and were developed by and for the CSBG Network through the work of the CSBG Working Group. The organizational standards are organized in three thematic groups containing nine categories and 58 standards that work together to characterize an effective and healthy organization while reflecting the vision and values of Community Action and the requirements of the CSBG Act.

1. Maximum Feasible Participation

- Consumer Input and Involvement
- Community Engagement
- Community Assessment

2. Vision and Direction

- Organizational Leadership
- Board Governance
- Strategic Planning

3. Operations and Accountability

- Human Resource Management
- Financial Operations and Oversight
- Data and Analysis

The purpose of the organizational standards is to ensure that all eligible entities have appropriate organizational capacity, not only in the critical financial and administrative areas important to all nonprofit and public human service agencies, but also in areas of unique importance for CSBG-funded eligible entities (CAAs).

II. PROCEDURES

Through the below process, subgrantee recipients must show compliance with meeting each standard.

A. On-going Compliance

Subgrantee recipients will utilize the CAPSystems online Organizational Standards Module,

B. Liaison On-going Monitoring Review

Using the CAPSystems online Organizational Standards Module, ODOC's most current CSBG Organizational Standards Interim State Guidance and Resources and the Community Action Partnership Glossary of Terms for the Organizational Standards, ODOC liaisons will review the subgrantee recipient's compliance with the CSBG Organizational Standards through desk and on-site monitoring visits. The ODOC Liaison will validate whether the subgrantee recipient has accurately met each standard.

The annual CSBG monitoring report, identifying unmet standards throughout the year, will be provided to subgrantee recipients.

Liaison and Subgrantee recipients will use the Technical Assistance Plan (TAP) and/or Quality Improvement Plan (QIP) processes to identify activities and timelines leading to compliance with the unmet standards.

C. Technical Assistance Plans (TAP) and Quality Improvement Plans (QIP)

During the on-going monitoring review process, if a State finds a subgrantee recipient is not meeting a standard or set of standards, the State's response will depend on the circumstances.

In cases where the subgrantee recipient may be able to meet the standard in a reasonable time frame contingent on some targeted technical assistance, the State and the subgrantee recipient will develop a technical assistance plan to target training and technical assistance resources and outline a time frame for the subgrantee recipient to meet the standard(s).

If appropriate in other situations, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

D. Corrective Action

1. Failure to meet a standard within 30-days of its due date will result in a Technical Assistance Plan (TAP) being initiated by the ODOC Liaison.
2. If the TAP does not result in the subgrantee recipient achieving compliance with the standard, a Quality Improvement Plan (QIP) will be initiated by the ODOC Liaison.
3. If the QIP does not result in the subgrantee recipient achieving compliance with the standard, the ODOC Liaison will initiate further corrective action up, including recommendation for termination or reduction of funding.

Provided the State is confident that a subgrantee recipient is moving toward meeting standards, under a technical assistance plan, QIP, or other oversight mechanism, the State should not initiate action to terminate or reduce funding.

The failure of a subgrantee recipient to meet multiple standards may reflect deeper organizational challenges and risk. In those cases, a State must determine whether it may be necessary to take additional actions, including reducing or terminating funding, in accordance with CSBG IM 116 (Corrective Action, Termination, or Reduction of Funding), issued May 1, 2012.

III. FORMS

1. Standard 4.3 NCRI or NCRT Involvement Verification **[Form 15]**

V. RESOURCES

CSBG Organizational Standards ODOC's Interim State Guidance and Resources (most current)

CSBG Organizational Standards Glossary of Terms:

https://communityactionpartnership.com/publication_toolkit/center-of-excellence-developed-csbg-organizational-standards-glossary-of-terms/

CSBG Organizational Standards Technical Assistance Guide – Category 1:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guides-category-1-consumer-input-involvement-public

CSBG Organizational Standards Technical Assistance Guide – Category 2:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-2-community-engagement-public/

CSBG Organizational Standards Technical Assistance Guide – Category 3:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-3-community-assessment-public/

CSBG Organizational Standards Technical Assistance Guide – Category 4:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-4-organizational-leadership-public/

CSBG Organizational Standards Technical Assistance Guide – Category 5:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-5-board-governance-public/

CSBG Organizational Standards Technical Assistance Guide – Category 6:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-6-strategic-planning-public/

CSBG Organizational Standards Technical Assistance Guide – Category 7:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-7-human-resource-management-public/

CSBG Organizational Standards Technical Assistance Guide – Category 8:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-8-financial-operations-oversight-public/

CSBG Organizational Standards Technical Assistance Guide – Category 9:

https://communityactionpartnership.com/publication_toolkit/organizational-standards-technical-assistance-guide-category-9-data-analysis-public/

OCS IM 116

<https://www.acf.hhs.gov/ocs/resource/no-116-corrective-action-termination-or-reduction-of-funding>

OCS IM 138

<https://www.acf.hhs.gov/ocs/resource/csbg-im-138-state-establishment-of-organizational-standards-for-csbg-eligible-entities>

Section 2 – CSBG Program

Req. 201 – Community Services Block Grant (CSBG)

**II – CSBG PROGRAM
REQUIREMENT NO. 201
COMMUNITY SERVICES BLOCK GRANT (CSBG)**

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	JANUARY 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Coats Human Services Reauthorization Act of 1998 places an increased emphasis on outcome performance measurements, accountability, monitoring, reporting, training, and technical assistance. In keeping with this increased focus, the continued goal for the State will be to provide a range of services and activities having a measurable and potentially major impact on the causes and effects of poverty-related problems within the State. <http://www.gpo.gov/fdsys/pkg/PLAW-105publ285/html/PLAW-105publ285.htm>

II. PROCEDURES

- A. In accordance with the CSBG Act, subgrantee recipients are required to follow the standard statutory CSBG Framework outlined in the CSBG Act which is based on:
 - i. A Community-level Needs Assessment (required by the CSBG Act)
 - ii. Strategic Planning and Funding decisions for services must be based on the results of the Community Needs Assessment
 - iii. The Community Needs Assessment requires broad input from the community, including people of low income themselves
- B. Subgrantee recipients are required to use the full ROMA Cycle to help ensure efficiency and effectiveness of services, initiatives that address the causes and conditions of poverty and to ensure stronger results for individuals, families and communities with low incomes
- C. In accordance with the State's goal, Community Services Block Grant (CSBG) subgrantee recipients are required to develop a Community Action Plan, develop meaningful performance targets to measure their clients' progress toward achieving self-sufficiency, as well as address the seven poverty-related areas as listed:
 - 1. Unemployment and under-employment
 - 2. Inadequate education
 - 3. Inability to make efficient/effective use of available income
 - 4. Inadequate housing
 - 5. Inability to meet emergency needs
 - 6. Starvation and malnutrition; and
 - 7. Inability to make efficient/effective use of related programs and services.

III. FORMS

None.

Req. 202 – Monitoring

II - CSBG PROGRAM
REQUIREMENT NO. 202
MONITORING OF CSBG FUNDED SUBGRANTEE RECIPIENTS

EFFECTIVE DATE:	January 1, 2022
REVISED DATE:	
REVIEW DATE:	

I. CONTRACTUAL REQUIREMENT

A. Purpose:

- To ensure a consistent understanding of state monitoring requirements for Subgrantee Recipients receiving CSBG funds in accordance with the Office of Community Services CSBG IM #97
- To verify that Subgrantee Recipients are meeting the state's performance goals, administrative standards, financial and other management requirements
- To verify Subgrantee Recipients use of the CSBG Framework and the full Results Oriented Management and Accountability (ROMA) cycle (assessment, planning, implementation, achievement of results, and evaluation)

B. Types of CSBG Monitoring:

1. Comprehensive On-site Monitoring Review:

- a. New Subgrantee Recipient will receive a comprehensive review within the first year of receiving CSBG funding.
- b. All other Subgrantee Recipients receiving CSBG funds will receive a comprehensive review at least once every three years (to be conducted no later than three years after the last comprehensive review).
- c. Comprehensive monitoring includes a review of programmatic outcomes (annual report), ROMA, administrative management, fiscal management/oversight, client eligibility verification and organizational standards.

2. Desktop Monitoring Review:

- a. Desktop Reviews will be conducted annually for all Subgrantee Recipients receiving CSBG funds.
- b. Desktop monitoring includes a review of programmatic outcomes, fiscal and compliance with organizational standards. The desktop review also includes the monthly review of expenditures and payments.

C. Pre-Award Risk Assessment:

- a. For all Subgrantee Recipients funded with CSBG funds, a pre-award risk assessment is conducted to identify current and potential risks that could affect the overall health of the organization, identify risk factors where the organization is vulnerable and

determine the overall risk ranking for the agency. Based on the final risk assessment score, and the last comprehensive review, the appropriate monitoring plan is implemented for each Subgrantee Recipient.

- b. The frequency of monitoring activities, including the on-site visit will be determined by how the Subgrantee Recipient is ranked in their pre-award risk assessment.
- c. State resources will focus on devoting more time to monitoring and providing technical assistance to agencies with the higher risk levels. Oversight is provided by the state Risk Review Committee.

- D. Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. ODOC shall perform monitoring and evaluation activities to assess the Subgrantee Recipient’s financial and programmatic compliance and progress.

II. PROCEDURES

State monitoring is a process to strengthen Subgrantee Recipients. Monitoring verifies compliance with contracts, the validity of annual outcome reports and assesses the overall health of a Subgrantee Recipient. The monitoring process includes:

- a system to document and inform the Subgrantee Recipients of findings and deficiencies
- identifying the need for training and technical assistance to Subgrantee Recipients
- a means for resolving findings and noting significant achievements

During any state or national emergency declaration of a pandemic, or during emergency situations which would prevent travel or in-person monitoring, the following procedures may be adjusted.

A. Monitoring Notification:

- Comprehensive Reviews: A monitoring notification is emailed to the Subgrantee Recipient 60-days prior to the actual monitoring
- Desktop Reviews: 30-days prior to the start of the review, or on a date mutually agreed upon, the state will notify the Subgrantee Recipient when the Annual/Desktop review will begin. The review will take place as close to the prior year’s monitoring date as possible.

B. Monitoring Assessments:

The state monitoring is focused on determining the overall health of the Subgrantee Recipient as a designated Community Action Agency through seven key areas:

1. Financial Management
2. Agency Management
3. Programs and Services
4. Human Resources
5. Community Relations
6. Board of Directors
7. ROMA

Each of the seven key areas is rated on a scale that include five ratings:

1. Thriving
2. Safe
3. Stable
4. Vulnerable
5. In-Crisis

The ratings from the seven key areas are then averaged to determine the overall health rating of the Subgrantee Recipient.

C. Initial Monitoring Reports: The State will disseminate initial monitoring reports to Subgrantee Recipients within 30-days of the completion of the monitoring review. To improve Subgrantee Recipients' capacity to achieve results, monitoring reports will provide:

- I. practical and constructive recommendation for opportunities for improvement
- II. best practice guidance for resolving deficiencies
- III. acknowledgement of achievement and successes

D. Addressing deficiencies: In an effort to resolve monitoring findings in a timely fashion and to prevent future reoccurrences, it is the state's goal to resolve all monitoring deficiencies within 90 days of the Subgrantee Recipient receiving the monitoring report.

Corrective action will be taken when a Subgrantee Recipient fails to:

- comply with the terms of a contract agreement
- comply with a State CSBG Plan
- meet a State requirement
- to provide services
- meet CSBG Organizational Standards
- meet other requirements established by the State, including performance objectives
- or has grant funds terminated for cause under a related program, such as Head Start, the Low-Income Home Energy Assistance Program (LIHEAP), the Weatherization Assistance Program, or other Federal programs

E. Follow-up:

- i. During the monitoring and/or on-going desktop assessment process, if ODOC finds a Subgrantee Recipient is not meeting state or federal requirements as mentioned above, the State will follow the procedures outlined in Requirement #203 for corrective action.
- i. The state will ensure follow-up for corrective action occurs until the problem(s) is resolved.
- ii. If the problem(s) is not resolved, the state will follow the procedures outlined in Requirement #203 to Terminate or Reduce Funding.

IV. FORMS

None.

Req. 203 – CSBG Corrective Action, Termination, Or Reduction of Funding

II - CSBG PROGRAM
REQUIREMENT NO. 203
CORRECTIVE ACTION, TERMINATION, OR REDUCTION OF FUNDING

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	January 1, 2022
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

- A. To ensure a consistent understanding of legal requirements and procedures for corrective action, termination, or proportional reduction of funding to Subgrantee Recipients receiving CSBG funds.
- B. ODOC will provide funding for the project as follows: The allocation of funds for this contract is based upon a base + formula allocation of funds as awarded by the U.S. Department of Health and Human Services' Office of Community Services for Fiscal Year 2014. Subgrantee Recipients shall receive funding for all counties designated as the Subgrantee Recipient's service area.
- C. Section 678B of the CSBG Act (42 U.S.C. § 9914) requires State CSBG Lead Agencies to establish "performance goals, administrative standards, financial management requirements, and other requirements" that ensure an appropriate level of accountability and quality among the State's eligible entities. ODOC shall perform monitoring and evaluation activities to assess the Subgrantee Recipient's financial and programmatic compliance and progress.

II. PROCEDURES

ODOC will utilize the guidance issued in CSBG IM No. 116 Corrective Action, Termination, or Reduction of Funding OCS IM 116 when:

<https://www.acf.hhs.gov/ocs/resource/no-116-corrective-action-termination-or-reduction-of-funding>

- A. Updates to the population and poverty level data included in the State's distribution formula causes a change in the proportional share to eligible entities.
- B. Based upon routine State monitoring, reviews, or investigations related to specific complaints or allegations, the State CSBG office determines that an eligible entity has failed to comply with the terms of an agreement or a State plan, or to meet a State requirement. The State's determination may be based on the entity's failure to provide CSBG services, or to meet appropriate standards, goals, and other requirements established by the State, including performance objectives (Sections 676(c)(1)(B) and 676(c)(2) of the CSBG Act).

III. Corrective Action

- a. Corrective action will be taken when a Subgrantee Recipient fails to:
 - comply with the terms of a contract agreement
 - comply with a State CSBG Plan
 - meet a State or Federal requirement
 - to provide services
 - meet CSBG Organizational Standards
 - meet other requirements established by the State, including performance objectives
 - or has grant funds terminated for cause under a related program, such as Head Start, the Low-Income Home Energy Assistance Program (LIHEAP), the Weatherization Assistance Program, or other Federal programs
- b. During the monitoring and/or on-going desktop assessment process, if ODOC finds a Subgrantee Recipient is not meeting state or federal requirements as mentioned above, ODOC's response will depend on the circumstances:
 1. Communication of Deficiencies and Corrective Action Requirements: When ODOC has determined that a Subgrantee Recipient has a specific deficiency, ODOC will communicate the deficiency to the Subgrantee Recipient and require the Subgrantee Recipient to correct the deficiency. To establish compliance with the requirements of the CSBG Act, records of correspondence or other communications related to an enforcement action against a Subgrantee Recipient will be maintained.
 2. Technical Assistance to Correct Deficiencies: ODOC will offer training and technical assistance, if appropriate, to help an Subgrantee Recipient correct identified deficiencies or failures to meet State requirements. Technical assistance may be offered concurrently with the notification of a deficiency or deficiencies and should focus on the specific issues of the eligible entity to the extent possible.

If ODOC determines that training and technical assistance are not appropriate, the State must prepare and submit a report to the Subgrantee Recipient stating the reasons that technical assistance is not appropriate. Some examples of situations in which a State may determine that technical assistance is not appropriate may include, but are not limited, to the following:

- A deficiency for which the eligible entity has the expertise and skills available within the organization to make corrective actions without assistance
- A deficiency for which the State has previously provided technical assistance and the eligible entity has failed to institute corrective actions
- Multiple, widespread, and/or repeated deficiencies that cannot feasibly be addressed through technical assistance

- A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing
3. Technical Assistance Plan (TAP): In cases where the Subgrantee Recipient may be able to achieve compliance in a reasonable time frame contingent on some targeted technical assistance, ODOC and the Subgrantee Recipient will develop a technical assistance plan to target training and technical assistance resources and outline a time frame for the entity to meet the requirement(s) and/or standard(s). The state's Risk Review Committee will review and approve all TAPs.
 4. Quality Improvement Plan (QIP): In other situations, ODOC may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915) and will establish a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress to correct an identified deficiency or deficiencies. The Act specifies that States must consider the seriousness of the deficiency and the time reasonably required to correct the deficiency. Examples of instances in which a State may exercise discretion on whether a quality improvement plan is appropriate or necessary may include, but are not limited to the following:
 - A deficiency for which an eligible entity has previously instituted a corrective action plan and has repeated findings
 - A deficiency that involves evidence of fraudulent reporting or use of funds, or other evidence of criminal wrongdoing and therefore presents a risk requiring immediate action

If ODOC determines that an eligible entity should be allowed to develop and implement a quality improvement plan, ODOC will allow the Subgrantee Recipient to develop and implement their plan within 60 days after being informed of a deficiency. The quality improvement plan must identify actions that will be taken to correct the deficiency within a reasonable time-period determined by ODOC based on the specific circumstances. The state's Risk Review Committee will review and approve all QIPs. ODOC must review and issue a decision on whether to approve the plan no later than 30 days after receiving the plan from a Subgrantee Recipient. If ODOC does not accept the plan, ODOC will specify the reasons why the proposed plan cannot be approved.

5. Progress toward achieving compliance: If ODOC is confident that the Subgrantee Recipient is moving toward meeting the requirement(s) and/or standard(s), under a TAP, QIP, or other oversight mechanism, ODOC will not initiate action to terminate or reduce funding. ODOC will conduct follow-up reviews with Subgrantee Recipients that fail to meet the goals, standards, and requirements established by the State. The state will provide oversight of compliance progress with TAPs and QIPs through its Risk Review Committee.
6. ODOC will investigate any instances of "whistleblower" complaints or allegations of fraud or abuse of CSBG funds or funds from closely related programs. In any instances in which

complaints or allegations of fraud are considered credible and raise significant “red flags,” OCS will be informed of findings and may assist with additional compliance review or referral to appropriate investigative authorities.

7. Opportunity for a Hearing: In accordance with Section 678C(a)(5) of the CSBG Act , ODOC will provide adequate notice and opportunity for a hearing prior to terminating organizational eligibility for CSBG funding or otherwise reducing the proportional share of funding to an entity for cause. Hearing procedures will be consistent with any applicable State policies, rules or statutory requirements. Pursuant to Section 678C(b) of the CSBG Act, OCS shall, upon request, review any final State determination to terminate or reduce funding of an eligible entity. In order to conduct such review, the requestor and State should submit to OCS all necessary documentation relating to the determination, including, for example, transcripts of the hearing and any documentation used in reaching the State’s decision. For the purposes of any Federal review, it is suggested that States provide the following information to OCS:
 - a. A copy of the notice provided in advance of the hearing that includes the date of the notice and the date of the hearing
 - b. The name of the presiding hearing official
 - c. The name(s) of official(s) or individual(s) responsible for determination of hearing findings or decisions (the CSBG State Official)
 - d. The names of the individuals participating in the hearing; and
 - e. Documentation of evidence presented at the hearing
8. State Proceedings to Terminate or Reduce Funding: After providing an opportunity for a hearing, if ODOC finds cause for termination or reduction in funding, ODOC will initiate proceedings to terminate the designation of or reduce the funding to an Subgrantee Recipient unless the entity corrects the deficiency. If ODOC determines that funding will be reduced or that eligibility for CSBG funds will be terminated, the State must notify both the eligible entity and the OCS of the decision.

IV. FORMS
None.

Req. 204 – CSBG DISCRETIONARY FUNDING

II - CSBG PROGRAM
REQUIREMENT NO. 204
CSBG DISCRETIONARY FUNDING

EFFECTIVE DATE:	JANUARY 1, 2022
REVISED DATE:	
REVIEW DATE:	

I. CONTRACTUAL REQUIREMENT

Included in the CSBG State Plan, 5% of the CSBG allotment is reserved as discretionary funds to support innovative community and neighborhood-based initiatives related to the purposes of the CSBG Act such as projects that reduce poverty, promote self-sufficiency, and promote community revitalization. The State Plan includes the following types of activities with the use of discretionary funds:

- Training and Technical Assistance to CAAs
- Statewide coordination and communication to CAAs (State Association)
- Analysis of distribution of CSBG funds to determine if targeting the greatest needs
- Asset building programs
- Innovative Programs by CAAs
- Online Data Systems for CAAs (CAPTAIN, CNA, Organizational Standards)

Funds are made available to CAAs upon submission of a request by the CAA (or network) for a pilot program, innovative project or other activities that address the needs of low-income individuals and/or lessen poverty in communities.

II. PROCEDURES

A. Eligible projects for discretionary funding may include innovative projects such as:

- Grassroots activities that provide intervention to the causes of poverty
- Projects that promote economic development for low-income households
- Projects to expand service opportunities for individuals/families with low incomes
- Community initiatives to reduce/eliminate poverty
- New programs that address the leading causes of poverty
- A novel, unique or fresh approach to meet an urgent or isolated need
- Services that are ground-breaking, pioneering, cutting-edge to meet needs
- Capacity building programs and professional development efforts targeted toward eligible entities.
- Training and technical assistance to eligible entities in need of assistance.

B. If awarded Discretionary funding, the application must be submitted in OKGrants within 15 calendar days, otherwise the notice of award expires and the funds will be re-obligated.

- C. For pilot program projects, discretionary funding is limited to 2-years for the project to become sustainable
- D. Discretionary projects must:
- be an eligible CSBG expense
 - produce a measurable outcome
 - determine any future ongoing costs and sustainability: Is this likely to be an ongoing project, and if so, will it require sustainable funding? Or is this project limited in duration?
- E. ODOC will periodically review the distribution of funds to determine if such funds have been targeted to areas of greatest need.
- F. ODOC shall perform monitoring and evaluation activities to assess the Subgrantee Recipient's financial and programmatic compliance and progress.

III. FORMS

None.

Section 3 – Head Start Program

Req. 301 – Head Start Program

**IV – HEAD START PROGRAM
REQUIREMENT NO. 301
HEAD START PROGRAM**

EFFECTIVE DATE:	SEPTEMBER 1, 2014
REVISED DATE:	
REVIEW DATE:	October 2021

I. CONTRACTUAL REQUIREMENT

Subgrantee Recipients shall establish procedures to comply with the requirements in the Head Start Performance Standards to provide Head Start Services to families and individuals.

II. PROCEDURES

- A. The state Appropriated Funds for the Head Start Program shall be utilized for one or all of the following primary Head Start Activities:
 - 1. Extended Services: Subgrantee Recipients must document extended services
 - 2. Expansion of Enrollment: The Subgrantee Recipients must show a quantifiable increase in enrollment.
 - 3. Early Intervention Strategies: Intervention services must be documented.
- B. Subgrantee Recipients must participate in an on-site financial/technical review offered by the Oklahoma Department of Commerce (ODOC) through the Oklahoma Association of Community Action Agencies (OKACAA) in the months before they receive a Federal Head Start review and provide a copy of the written report to OKACAA, unless specifically exempted by OKACAA.
- C. Subgrantee Recipients shall submit Head Start Enhancement Activity information at the time of annual application. Any revisions to the work summary shall be submitted to and approved in writing by ODOC.
- D. Subgrantee Recipients shall adhere to all Head Start Performance Standards as dictated by the federal Head Start Program.
- E. Subgrantee Recipients shall provide outcome reports in the required reporting format.

III. FORMS

None.